

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LEAR CAPITAL, INC.,¹

Debtor.

Chapter 11 (Subchapter V)

Case No. 22-10165 (BLS)

**NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MARCH 24, 2022 AT 1:30 P.M. (ET)**

**** AS NO MATTERS ARE SCHEDULED TO GO FORWARD, THIS HEARING
HAS BEEN CANCELLED WITH PERMISSION OF THE COURT ****

ADJOURNED MATTERS:

1. Debtor's Motion for Interim and Final Orders Authorizing: (I) Maintenance of Existing Bank Accounts, (II) Suspending the Requirements of Section 345(b); (III) Continued Use of Existing Cash Management System, and (IV) Continued Use of Business Forms Pursuant to 11 U.S.C. §§ 105, 345, 363, 364, 503, 1107 and 1108 of the Bankruptcy Code [[Docket No. 6](#), Filed March 2, 2022].

Objection Deadline: March 17, 2022 at 4:00 p.m.

Responses/Objections Received:

- A. Unites States Trustee's Limited Objection and Reservation of Rights Concerning Debtor's Motion for Interim and Final Orders Authorizing: (I) Maintenance of Existing Bank Accounts, (II) Suspending the Requirements of Section 345(b); (III) Continued Use of Existing Cash Management System, and (IV) Continued Use of Business Forms Pursuant to 11 U.S.C. §§ 105, 345, 363, 364, 503, 1107 and 1108 of the Bankruptcy Code [[Docket No. 53](#), Filed March 16, 2022].

Related Documents:

- A. Declaration of John Ohanesian, President and CEO of Lear Capital, Inc., in Support of First Day Motions [[Docket No. 15](#), Filed March 2, 2022].

¹ The last four digits of the Debtor's federal tax identification number are 7197. The Debtor's address is 1990 S. Bundy Drive, Suite 600, Los Angeles CA 90025.

² Amended items appear in **BOLD**.

- B. Interim Order Authorizing: (I) Maintenance of Existing Bank Accounts, (II) Suspending the Requirements of Section 345(b); (III) Continued Use of Existing Cash Management System, and (IV) Continued Use of Business Forms Pursuant to 11 U.S.C. §§ 105, 345, 363, 364, 503, 1107 and 1108 of the Bankruptcy Code [[Docket No. 27](#), Entered March 4, 2022].

Status: An Interim Order was entered, with respect to the motion. The Debtor and the UST have agreed to continue the hearing to April 27, 2022 at 11:00 a.m. (ET).

RESOLVED MATTERS:

2. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Certain Prepetition Employee Claims, Including Wages and Salaries, (II) Authorizing Payment of Certain Employee Benefits and Confirming Right to Continue Employee Benefits on Postpetition Basis, (III) Authorizing Payment of Reimbursement to Employees for Prepetition Expenses, (IV) Authorizing Payment of Withholding and Payroll-Related Taxes, (V) Authorizing Payment of Prepetition Claims Owing to Administrators and Third Party Providers, and (VI) Allowing Banks to Honor Prepetition Checks and Fund Transfers for Authorized Payments [[Docket No. 5](#), Filed March 2, 2022].

Objection Deadline: March 22, 2022 at 11:00 a.m. (Extended for Chubb and Federal Insurance)

Responses/Objections Received:

- A. Informal comments from the United States Trustee.
- B. Informal comments from Chubb.
- C. Informal comments from Federal Insurance.

Related Documents:

- A. Declaration of John Ohanesian, President and CEO of Lear Capital, Inc., in Support of First Day Motions [[Docket No. 15](#), Filed March 2, 2022].
- B. Interim Order (I) Authorizing Payment of Certain Prepetition Employee Claims, Including Wages and Salaries, (II) Authorizing Payment of Certain Employee Benefits and Confirming Right to Continue Employee Benefits on Postpetition Basis, (III) Authorizing Payment of Reimbursement to Employees for Prepetition Expenses, (IV) Authorizing Payment of Withholding and Payroll-Related Taxes, (V) Authorizing Payment of Prepetition Claims Owing to Administrators and Third Party Providers, and (VI) Allowing Banks to Honor Prepetition Checks and Fund Transfers for Authorized Payments [[Docket No. 26](#), Entered March 4, 2022].

- C. Certification of Counsel Regarding Amended Interim Order (I) Authorizing Payment of Certain Prepetition Employee Claims, Including Wages and Salaries, (II) Authorizing Payment of Certain Employee Benefits and Confirming Right to Continue Employee Benefits on Postpetition Basis, (III) Authorizing Payment of Reimbursement to Employees for Prepetition Expenses, (IV) Authorizing Payment of Withholding and Payroll-Related Taxes, (V) Authorizing Payment of Prepetition Claims Owing to Administrators and Third Party Providers, and (VI) Allowing Banks to Honor Prepetition Checks and Fund Transfers for Authorized Payments [[Docket No. 57](#), Entered Filed March 21, 2022].
- D. Certification of Counsel Regarding Final Order (I) Authorizing Payment of Certain Prepetition Employee Claims, Including Wages and Salaries, (II) Authorizing Payment of Certain Employee Benefits and Confirming Right to Continue Employee Benefits on Postpetition Basis, (III) Authorizing Payment of Reimbursement to Employees for Prepetition Expenses, (IV) Authorizing Payment of Withholding and Payroll-Related Taxes, (V) Authorizing Payment of Prepetition Claims Owing to Administrators and Third Party Providers, and (VI) Allowing Banks to Honor Prepetition Checks and Fund Transfers for Authorized Payments [[Docket No. 63](#), Filed March 21, 2022].
- E. Amended Interim Order (I) Authorizing Payment of Certain Prepetition Employee Claims, Including Wages and Salaries, (II) Authorizing Payment of Certain Employee Benefits and Confirming Right to Continue Employee Benefits on Postpetition Basis, (III) Authorizing Payment of Reimbursement to Employees for Prepetition Expenses, (IV) Authorizing Payment of Withholding and Payroll-Related Taxes, (V) Authorizing Payment of Prepetition Claims Owing to Administrators and Third Party Providers, and (VI) Allowing Banks to Honor Prepetition Checks and Fund Transfers for Authorized Payments [[Docket No. 70](#), Entered March 22, 2022].**
- F. Final Order (I) Authorizing Payment of Certain Prepetition Employee Claims, Including Wages and Salaries, (II) Authorizing Payment of Certain Employee Benefits and Confirming Right to Continue Employee Benefits on Postpetition Basis, (III) Authorizing Payment of Reimbursement to Employees for Prepetition Expenses, (IV) Authorizing Payment of Withholding and Payroll-Related Taxes, (V) Authorizing Payment of Prepetition Claims Owing to Administrators and Third Party Providers, and (VI) Allowing Banks to Honor Prepetition Checks and Fund Transfers for Authorized Payments [[Docket No. 75](#), Entered March 22, 2022].**

Status: A Final Order has been entered. No hearing is necessary.

4. Motion Pursuant to Sections 105 and 366 of the Bankruptcy Code for Entry of Interim and Final Orders (I) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtor, (II) Determining that the Utility Companies are Adequately Assured of Postpetition Payment and (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance [[Docket No. 7](#), Filed March 2, 2022].

Objection Deadline: March 17, 2022 at 4:00 p.m.

Responses/Objections Received: None at this time.

Related Documents:

- A. Declaration of John Ohanesian, President and CEO of Lear Capital, Inc., in Support of First Day Motions [[Docket No. 15](#), Filed March 2, 2022].
- B. Interim Order Granting Motion Pursuant to Sections 105 and 366 of the Bankruptcy Code for Entry of Interim and Final Orders (I) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtor, (II) Determining that the Utility Companies are Adequately Assured of Postpetition Payment and (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance Code [[Docket No. 28](#), Entered March 4, 2022].
- C. Certificate of No Objection Regarding Motion Pursuant to Sections 105 and 366 of the Bankruptcy Code for Entry of Final Order (I) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtor, (II) Determining that the Utility Companies are Adequately Assured of Postpetition Payment and (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance [[Docket No. 59](#), Filed March 21, 2022]
- D. Final Order Granting Motion Pursuant to Sections 105 and 366 of the Bankruptcy Code (I) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtor, (II) Determining that the Utility Companies are Adequately Assured of Postpetition Payment and (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance [[Docket No. 69](#), Entered March 22, 2022].**

Status: **A Final Order has been entered. No hearing is necessary.**

5. Debtor's Motion Pursuant to Sections 105(a), 507(a)(8), and 541(d) of the Bankruptcy Code for an Interim and Final Order: (I) Authorizing Payment of Prepetition Sales Tax and Other Similar Taxes and Fees; and (II) Authorizing Banks and Other Financial Institutions to Receive, Process, Honor and Pay Checks Issued and Electronic Payments Requests Made Related to Such Taxes and Fee [[Docket No. 8](#), Filed March 2, 2022].

Objection Deadline: March 17, 2022 at 4:00 p.m.

Responses/Objections Received: None at this time.

Related Documents:

- A. Declaration of John Ohanesian, President and CEO of Lear Capital, Inc., in Support of First Day Motions [[Docket No. 15](#), Filed March 2, 2022].
- B. Interim Order Pursuant To Sections 105(A), 507 (A)(8), and 541(D) of the Bankruptcy Code: (I) Authorizing Payment of Prepetition Sales Tax and Other Similar Taxes and Fees; and (II) Authorizing Banks and Other Financial Institutions to Receive, Process, Honor and Pay Checks Issued and Electronic Payments Requests Made Related to Such Taxes and Fee [[Docket No. 29](#), Entered March 4, 2022].
- C. Certificate of No Objection Regarding Final Order Pursuant to Sections 105(a), 507(a)(8), and 541(d) of the Bankruptcy Code for an Interim and Final Order: (I) Authorizing Payment of Prepetition Sales Tax and Other Similar Taxes and Fees; and (II) Authorizing Banks and Other Financial Institutions to Receive, Process, Honor and Pay Checks Issued and Electronic Payments Requests Made Related to Such Taxes and Fee [[Docket No. 60](#), Filed March 21, 2022].
- D. Final Order Pursuant to Sections 105(a), 507(a)(8), and 541(d) of the Bankruptcy Code for an Interim and Final Order: (I) Authorizing Payment of Prepetition Sales Tax and Other Similar Taxes and Fees; and (II) Authorizing Banks and Other Financial Institutions to Receive, Process, Honor and Pay Checks Issued and Electronic Payments Requests Made Related to Such Taxes and Fee [[Docket No. 72](#), Entered March 21, 2022].**

Status: A Final Order has been entered. No hearing is necessary.

6. Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay Prepetition Claims of Shippers and Warehousemen; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [[Docket No. 12](#), Filed March 2, 2022].

Objection Deadline: March 17, 2022 at 4:00 p.m.

Responses/Objections Received: None at this time.

Related Documents:

- A. Declaration of John Ohanesian, President and CEO of Lear Capital, Inc., in Support of First Day Motions [[Docket No. 15](#), Filed March 2, 2022].
- B. Interim Order (I) Authorizing the Debtor to Pay Prepetition Claims of Shippers and Warehousemen; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [[Docket No. 31](#), Entered March 4, 2022].
- C. Certificate of No Objection Regarding Motion of the Debtor for Entry of Final Order (I) Authorizing the Debtor to Pay Prepetition Claims of Shippers and Warehousemen; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [[Docket No. 61](#), Filed March 21, 2022].
- D. Final Order (I) Authorizing the Debtor to Pay Prepetition Claims of Shippers and Warehousemen; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [[Docket No. 73](#), Entered March 22, 2022].**

Status: **A Final Order has been entered. No hearing is necessary.**

7. Debtor's Motion for an Order Authorizing Debtor to Honor and Continue Certain Business Practices and Customer Obligations in the Ordinary Course of Business and Granting Related Relief [[Docket No. 13](#), Filed March 2, 2022].

Objection Deadline: March 17, 2022 at 4:00 p.m.

Responses/Objections Received: None at this time.

Related Documents:

- A. Declaration of John Ohanesian, President and CEO of Lear Capital, Inc., in Support of First Day Motions [[Docket No. 15](#), Filed March 2, 2022].

- B. Interim Order (I) Authorizing the Debtor's Motion for an Order Authorizing the Debtor to Honor and Continue Certain Business Practices in the Ordinary Course of Business and (II) Granting Certain Related Relief [[Docket No. 32](#), Entered March 4, 2022].
- C. Certificate of No Objection Regarding Debtor's Motion for a Final Order (I) Authorizing the Debtor's Motion for an Order Authorizing the Debtor to Honor and Continue Certain Business Practices in the Ordinary Course of Business and (II) Granting Certain Related Relief [[Docket No. 62](#), Filed March 21, 2022].
- D. Final Order (I) Authorizing the Debtor's Motion for an Order Authorizing the Debtor to Honor and Continue Certain Business Practices in the Ordinary Course of Business and (II) Granting Certain Related Relief [[Docket No. 74](#), Entered March 22, 2022].**

Status: A Final Order has been entered. No hearing is necessary.

Dated: March 23, 2022
Wilmington, Delaware

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/s/ Jeffrey R. Waxman

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